

LAW OFFICES OF BING LI, LLC  
BING LI (BL 5550)  
1350 BROADWAY, SUITE 1001  
NEW YORK, NY 10018-0947  
(212) 967-7690  
ATTORNEYS FOR DEFENDANT-DEBTOR  
JIMMY ZHAN A/K/A YI Q. ZHAN

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
KOON CHUN HING KEE SOY & SAUCE : 04 Civ. 2293 (JFB)(SMG)  
FACTORY, LTD., a company :  
organized under the laws of :  
Hong Kong, :  
 : **NOTICE OF MOTION**  
Plaintiff, :  
 :  
-against- :  
 :  
STAR MARK MANAGEMENT, INC., a :  
New York corporation; GREAT MARK :  
CORPORATION, a New York :  
corporation; JIMMY ZHAN, an :  
individual (a/k/a Yi Q. Zhan); :  
and JOHN DOES 1 through 10, :  
 :  
Defendants. :  
-----X

**PLEASE TAKE NOTICE** that, upon the Declaration of Bing Li made the 16th day of July, 2010, together with the exhibits annexed thereto, the Memorandum of Law in support, and upon all of the pleadings and proceedings heretofore had herein, defendant/judgment debtor Jimmy Zhan a/k/a Yi Q. Zhan ("Zhan"), and his family members and certain nonparty corporations to this proceeding--Jessica Yang and/or Yang

Xiao Geng, his wife; Michael Zhan and Edmund Zhan, his two sons; Yan Zhang Yang, and Yu Mei Zhao, his parents-in-law; and G.K. Exotic Inc. (collectively "Nonparty Movants")--by and through their undersigned attorneys, will move this Court before the Honorable Steven M. Gold, U.S.M.J., at the Courthouse located at 225 Cadman Plaza East, Brooklyn, New York, on August 13, 2010, at 9:30 p.m., or as soon thereafter as counsel may be heard, pursuant to Rule 69 of the Federal Rules of Civil Procedure ("F.R.Civ.P."), Section 5223 of the McKinney's Civil Practice Law and Rules ("CPLR"), CPLR 5240, and the Court's broad discretionary powers under CPLR 5240, for an order quashing or modifying twelve (12) subpoenas duces tecum all issued in the name of the Court on June 22, 2010 to the extent that disclosure concerning the assets and finances of the Nonparty Movants be not made, and granting the Nonparty Movants such other and further relief as the Court may deem just and equitable.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Local Civil Rule 6.1 of the United States District Courts for the Southern and Eastern Districts of New York (amd. thr. 5/11/2010), any opposing affidavits and answering memorandum of law shall be served within fourteen (14) days after service of the moving papers, and any reply affidavits and

memoranda of law shall be served within seven (7) days after service of the answering papers.

Dated: New York, New York  
July 16, 2010

LAW OFFICES OF BING LI, LLC  
ATTORNEYS FOR JIMMY ZHAN A/K/A  
YI Q. ZHAN

By: \_\_\_\_\_  
BING LI (BL 5550)  
1350 BROADWAY, SUITE 1001  
NEW YORK, NY 10018-0947  
(212) 967-7690

CERTIFICATE OF SERVICE

I, Bing Li, hereby certify that on this 16th day of July, 2010, I served a true copy of the within Notice of Motion, Declaration of Bing Li, and Memorandum of Law in Support of Motion on the parties/entities herein named at the following address:

YUEN ROCCANOVA SELTZER & SVERD P.C.  
132 Nassau Street, Suite 1300  
New York, NY 10038  
Tel. (212) 608-1178  
Fax (212) 608-2913  
Attention: Joseph T. Roccanova, Esq.  
Attorneys for Plaintiff/Judgment Creditor  
Koon Chun Hing Kee Soy & Sauce Factory, Ltd.  
via ECF

BANK OF AMERICA  
Legal Order Processing Dept. NE  
5701 Horatio Street  
Utica, NY 13502  
via Regular Mail

BLUE RIBBON ACCOUNTING & TAX CPA  
83-21 Broadway  
Elmhurst, NY 11373  
via Regular Mail

CAPITAL ONE BANK  
Attention: 12070-7000  
15000 Capital One Drive  
Richmond, VA 23238-1119  
via Email ([Subpoena@capitalone.com](mailto:Subpoena@capitalone.com))

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San Francisco, CA 94014  
via Regular Mail

CHASE BANK  
51-15 Metropolitan Avenue  
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via Regular Mail

CHINA TRUST BANK  
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Torrance, CA 90505  
Attention: Lee Parish, Esq.  
via Regular Mail

CITIBANK  
Legal Department  
100 Citibank Drive  
San Antonio TX 78250  
via Regular Mail

DISCOVER FINANCIAL SERVICES  
P.O. Box 6103  
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FIRSTRADE SECURITIES INC.  
133-25 37th Avenue  
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HSBC  
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NORTH FORK BANK  
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Flushing, NY 11365  
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SCOTTRADE STOCK  
Legal Department  
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St. Louis, MO 63131  
via Regular Mail

/s/  
Bing Li (BL 5550)